IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TENNESSEE CONFERENCE OF THE)	
NATIONAL ASSOCIATION FOR THE)	
ADVANCEMENT OF COLORED)	
PEOPLE, et al.,)	
)	
Plaintiffs,)	No. 3:20-cv-01039
)	
v.)	Judge Campbell
)	Magistrate Judge Frensley
)	
WILLIAM LEE, et al.)	
)	
Defendants.)	

NOTICE OF FILING PROPOSED ORDER OF INJUNCTION

The Court ordered Defendants Tre Hargett and Mark Goins along with Plaintiff Tennessee Conference of the National Association for the Advancement of Colored People ("TN NAACP"), to each file a proposed injunction as to Count Six of the First Amended Complaint (Order, D.E. 225), on which count the Court granted summary judgment on April 18, 2024, to Plaintiff TN NAACP, (Mem. Opinion and Order, D.E. 221, 222). For the sole purpose of complying with the Court's May 7, 2024 order, Defendants Tre Hargett and Mark Goins submit the attached proposed order of injunction based on the Court's April 18, 2024 ruling. In filing this proposed order of injunction, Defendants do not waive any right to appeal, nor do Defendants waive any position Defendants may take on appeal or in support of a motion for stay pending appeal. *See, e.g., Curves, LLC v. Spalding County*, 569 F. Supp. 2d 1305, 1315 (N.D. Ga. 2007). Moreover, Defendants' submission of this proposed order of injunction should not be construed as an agreement that an injunction should be entered or construed as a concession that Defendants' policies and

procedures, past or present, conflict with the National Voters Registration Act, 52 U.S.C. §§ 20501-20511.

Respectfully submitted,

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/s/ Zachary L. Barker

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the above document has been forwarded electronically. Notice of this filing will be sent by the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

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Date: May 8, 2024

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